

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**In Re:** )  
 )  
**BARRETT, TIMOTHY M.** ) **Case No. 17-20621-CBM**  
 )  
      **Debtor,** ) **Chapter 7**  
 )  
**Rosemary C. Crawford, Trustee** )  
 ) **Related Doc. Nos.: 91, 97,**  
      **Movant,** )  
 ) **Hearing Date: 10/2/2018 @ 2:30 PM**  
**BARRETT, TIMOTHY M.** )  
 )  
      **Respondent.** )

**TRUSTEE'S OBJECTION OF THE TRUSTEE TO DEBTOR'S EXEMPTIONS  
UNDER AMENDED SCHEDULE C**

AND NOW, comes the Trustee, Rosemary C. Crawford, by and through her counsel, Crawford McDonald, LLC, and objects to the Debtor's Exemptions under Amended Schedule C in the above captioned case for the following reasons:

1. The Debtor, Timothy M. Barrett ("Debtor") filed a voluntary Chapter 7 Petition on or about 02/20/2017.
2. Rosemary C. Crawford was duly appointed and qualified as Chapter 7 Trustee.
3. This Honorable Court has jurisdiction pursuant to 28 USC § 1334, and 28 USC § 157.
4. This is a core proceeding within the meaning of 28 USC § 157(b)(2)(B) and (E).
5. The 341a Meeting of Creditor's was held on 10/16/2017.

6. The Debtor filed an Amended Scheduled A/B on 08/07/2018 at Docket No. 97, whereby Debtor listed at #22 the Bristol County, VA Appeal Bond in the amount of \$10,715.00.
7. On Debtor's Amended Schedule C, also filed at Docket No. 97, the Debtor claimed the above listed property exempt under Section 522(d)(5) of the bankruptcy code.
8. The Debtor failed to disclose this Appeal Bond on his original bankruptcy petition.
9. A debtor is required to make full disclosure of his assets and liabilities in a bankruptcy case. The obvious reason for this requirement is to ensure that full and candid disclosures are made to the trustee, the court and the debtor's creditors.  
*See.* 11 USC § 521, and 11 USC § 541.
10. The Trustee only learned of the existence of the Appeal Bond during questioning at the 341(a) meeting of creditors on 10/16/2017.
11. The Debtor filed the Amended Schedule A/B and Amended Schedule C to include the Appeal Bond after Trustee filed TRUSTEE'S MOTION TO DIRECT BRISTOL, VA CIRCUIT COURT TO DISBURSE ESCROWED FUNDS OVER TO TRUSTEE ROSEMARY C. CRAWFORD on 07/27/2018 at Docket No. 91.
12. The Trustee objects to the amended claimed exemption, and requests that it be denied.

WHEREFORE, the Trustee prays that this Honorable Court enter an Order denying the Debtor's claimed amended exemption as noted in this Objection.

Respectfully submitted,

/s/ Rosemary C. Crawford

Rosemary C. Crawford, Esq., Trustee  
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Dated: August 14, 2018